

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

)	Case No. 1:21-cv-00135
)	
In re Clearview AI, Inc. Consumer Privacy)	Judge Sharon Johnson Coleman
Litigation)	
)	Magistrate Judge Maria Valdez
)	

**PLAINTIFF ANTHONY HALL’S MEMORANDUM IN SUPPORT OF
SCOTT R. DRURY’S APPOINTMENT AS LEAD COUNSEL**

Plaintiff, Anthony Hall, through counsel, files this memorandum in support of Scott R. Drury’s application for Lead Counsel in the above-captioned matter. Mr. Drury has displayed impressive leadership, professionalism, and command of the procedural and substantive law that will determine the outcome of this complex litigation.

Mr. Hall filed his own lawsuit alleging claims against Clearview in February 2020. In the weeks that followed, Mr. Drury – who had filed the *Mutnick* case (the first-filed of all of the now consolidated cases) three weeks prior – contacted Mr. Hall’s counsel to introduce himself and his case, establish communication, and to offer help and collaboration as the cases progressed.

Neighborhood Legal and co-counsel Community Lawyers represent Mr. Hall. Both are small firms which focus on various aspects of consumer law, including claims brought under the Fair Debt Collection Practices Act, The Fair Credit Reporting Act, the Illinois Consumer Fraud Act, and the Illinois Biometric Information Privacy Act. Counsel for Hall currently represent plaintiffs in multiple BIPA individual and class actions in the Northern District of Illinois and Circuit Court of Cook County, as well as in arbitration.¹ Counsel in Hall also represent the

¹ See, e.g., *Brewer v. Pepperidge Farm, Inc.*, 21-cv-535, (N.D. IL)(CAFA class action, biometric timeclock); *Webber v. CoWorx Staffing Services, LLC*, 21-cv-251, (N.D. IL)(CAFA class action, biometric access control);

plaintiff in a CAFA class action case involving the use of Clearview's technology by a third-party: *Carmean v. Macy's Retail Holdings, Inc.*, 20-cv-4589, (N.D. Ill.), currently pending before Judge Marvin Aspen. Michael Drew, founder of Neighborhood Legal and lead counsel in the *Hall* and *Macy's* has a background in software engineering and cybersecurity. Mr. Drew looks forward to working with the diverse coalition of plaintiffs and counsel that Mr. Drury has assembled and is eager to assist Mr. Drury in obtaining relief for the class.

Mr. Drury has consistently worked to collaborate with each of the other plaintiffs and their counsel in the subsequently filed suits. Hall's case has already benefitted from the insight, expertise, and resources that Mr. Drury and Loevy have brought to the table and shared generously with all other plaintiffs and their counsel. Indeed, Mr. Drury is unique amongst all plaintiff's counsel in these cases as he is the only one to regularly conferred with and updated Hall's counsel since day one. His insights and advice have been invaluable. And critically, his central concern throughout, expressed in word and deed, was for a fair and just resolution for the individual plaintiffs and the putative class members.

No doubt Mr. Drury's own application will provide the details of his experience and qualifications, but it should be remarked here that beyond any of his legal or professional accomplishments, Mr. Drury's personal temperament also makes him ideally suited to guide this litigation.

Dated: February 23, 2021

Submitted by:

s/Michael Drew

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CERTIFICATE OF SERVICE

I, Michael Drew, an attorney, hereby certify that on February 23, 2021, I filed the foregoing document via CM/ECF which will e-mail a copy of the same to all counsel of record.

/s/ Michael W. Drew